

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAWRENCE OBSTFELD,
individually and derivatively on behalf of
TOEV MEDICAL CORPORATION,
and IGNITION VENTURES, INC.,

Plaintiff,

- against -

ARTHUR SCHWARTZ, RONALD
SOLAR, RENAISSANCE
BIOMEDICAL, INC., GLEN LIEBER,
and THERMOPEUTIX, INC.,

Defendant.

7 cv 5847 (DAB)

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, W. Cameron Beard a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: RICHARD P. McELROY

Firm Name: McElroy & Associates, LLP

Address: 202A North Monroe Street

City/State/Zip: Media, PA 19063

Phone Number: (610) 566-8302

Fax Number: (610) 566-8305

RICHARD P. McELROY is a member in good standing of the Bar of the States of
Pennsylvania.

There are no pending disciplinary proceeding against RICHARD P. McELROY
in any State or Federal court.

Dated: 8/13/2007

City, State: New York, New York

Respectfully submitted,

Sponsor's

SDNY Bar WB-7354

Firm Name: Blank Rome LLP

Address: 405 Lexington Avenue

City/State/Zip: New York, NY 10174

Phone Number: 212-885-5000

Fax Number: 212-885-5001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAWRENCE OBSTFELD, individually and
derivatively on behalf of TOEV MEDICAL
CORPORATION, and IGNITION
VENTURES, INC.,

Plaintiffs,

-against-

ARTHUR SCHWARTZ, RONALD SOLAR,
RENAISSANCE BIOMEDICAL, INC.,
GLEN LIEBER, and THERMOPEUTIX,
INC.,

Defendants.

Civil Action No. 07 CV 5847
(DAB) (FM)

ECF CASE

**AFFIDAVIT OF W. CAMERON BEARD
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

State of New York)
 : ss.:
County of New York)

W. CAMERON BEARD, being duly sworn, hereby deposes and says as follows:

1. I am counsel at Blank Rome LLP, counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Richard P. McElroy as counsel pro hac vice to represent Defendant in this matter.

2. I am a member in good standing of the bar of the States of New York and Connecticut, and was admitted to practice law in those states in 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Richard P. McElroy was previously a partner in our firm, Blank Rome LLP, and I am informed by those of my partners acquainted with him that he is a man of the highest integrity.

4. Richard P. McElroy is a partner at McElroy & Associates, LLP in Media, Pennsylvania.

5. I have no reason to doubt that Mr. McElroy is a skilled attorney and a person of integrity, experienced in federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Richard P. McElroy, pro hac vice.

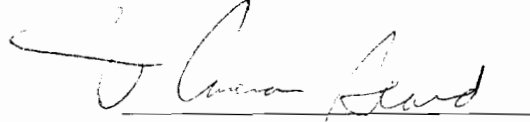
7. I respectfully submit a proposed order granting the admission of Richard P. McElroy, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Richard P. McElroy, pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated: New York, New York
August 13, 2007

Respectfully Submitted,

BLANK ROME LLP



W. Cameron Beard
SDNY Bar Code: (WB-7354)
405 Lexington Avenue
New York, New York 10174
Tel No.: (212) 885-5000
Fax No.: (212) 885-5001

Sworn to before me this
13th day of August, 2007


Notary Public

HILLARY K. JACKSON
Notary Public, State of New York
No. 01JA6107319
Qualified in New York County
Commission Expires March 22, 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAWRENCE OBSTFELD, individually and
derivatively on behalf of TOEV MEDICAL
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VENTURES, INC.,

Plaintiffs,

-against-

ARTHUR SCHWARTZ, RONALD SOLAR,
RENAISSANCE BIOMEDICAL, INC.,
GLEN LIEBER, and THERMOPEUTIX,
INC.,

Defendants.

Civil Action No. 07 CV 5847
(DAB) (FM)

ECF CASE

**CERTIFICATE OF RICHARD P. MCELROY IN SUPPORT OF
MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE**

RICHARD P. McELROY hereby states as follows:

1. I am a Partner of McElroy & Associates, LLP, 202A North Monroe Street, Media, PA 19063.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-caption matter.
3. As shown in the Certificate of Good Standing attached hereto, I am a member in good standing of the Bar of the Commonwealth of Pennsylvania.
4. I am also licensed to practice in the United States District Court for the Eastern District of Pennsylvania, the Third, Tenth and Eleventh Circuit Courts of Appeals, and the Supreme Court of the United States.

5. There are no pending disciplinary proceedings against me in any State or Federal court.

6. Wherefore your affiant respectfully requests that he be permitted to appear as counsel and advocate *pro hac vice* in this case.

Under 28 U.S.C. § 1746, I, Richard P. McElroy, do hereby certify under penalties of perjury, that the above statements are true and correct.

Dated: August 2, 2007


Richard P. McElroy



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Richard P. McElroy, Esq.

DATE OF ADMISSION

November 20, 1967

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 31, 2007


Patricia A. Johnson
Chief Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LAWRENCE OBSTFELD, Individually and
derivatively on behalf of TOEV MEDICAL
CORPORATION, and IGNITION VENTURES,
INC.

Plaintiff,

cv 5847 (DAB)

- against -

ARTHUR SCHWARTZ, RONALD SOLAR,
RENAISSANCE BIOMEDICAL, INC., GLEN
LIEBER and THERMOPEUTIX, INC.

Defendant.

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of W. Cameron Beard attorney for Arthur Schwartz
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Richard P. McElroy
Firm Name: McElroy & Associates, LLP
Address: 202A North Monroe Street
City/State/Zip: Media, PA 19063
Telephone/Fax: (610) 566-8302
Email Address: rmcelroy@themcelroyfirm.com

is admitted to practice pro hac vice as counsel for Arthur Schwartz in the above
captioned case in the United States District Court for the Southern District of New York. All attorneys
appearing before this Court are subject to the Local Rules of this Court, including the Rules governing
discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall
immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice
fee to the Clerk of Court.

Dated:
City, State:

United States District/Magistrate Judge


CERTIFICATE OF SERVICE

I, W. Cameron Beard, an attorney, hereby certify that on August 13, 2007, I caused to be served on the following counsel(s) of record the attached *Motion to Admit Counsel Richard P. McElroy Pro Hac Vice*, with supporting affidavit and certificate by First Class Mail to:

Marc M. Isaac, Esq.
Law Office of Marc M. Isaac PLLC
210 Moore Avenue
Freeport, New York 11520

Kerin Elizabeth Coughlin, Esq.
Constantine Cannon LLP
450 Lexington Avenue, 17th Floor
New York, NY 10017

Dated: New York, New York
August 13, 2007



W. Cameron Beard